

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JASON SWINFORD

§

VS.

§

COIL TUBING TECHNOLOGY, INC. and
TOUCAN DOWNHOLE SOLUTIONS, LLC

§
§

Case No. 4:19-cv-02301

PLAINTIFF'S PRIVILEGE LOG

Pursuant to the Federal Rules of Civil Procedure, Plaintiff, Jason L. Swinford (“Swinford” or “Plaintiff”) hereby serves its Privilege Log to Defendants, Coil Tubing Technology, Inc. and Toucan Downhole Solutions, LLC (collectively “Defendants”).

Respectfully submitted,

HIRSCH & WESTHEIMER, P.C.

By: /s/ Eric Lipper

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**ATTORNEYS FOR PLAINTIFF,
JASON L. SWINFORD**

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February, 2020, a true and correct copy of the foregoing and/or attached was served on each attorney of record or party in accordance with **Federal Rule of Civil Procedure 5(b)** as follows:

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/s/ Eric Lipper
Eric Lipper

	DATE	DOC TYPE/DESCRIPTION	AUTHOR	RECEIVER	SECONDARY RECEIVER	PRIVILEGE	DESCRIPTION
1.	10/20/15	Email re: [REDACTED]	Eric Mirabel	Jason Swinford	N/A	Attorney/Client	Bates Labeled SWINFORD FED PRIVILEGE – 000001- 3
2.	10/29/15	Email re [REDACTED]	Eric P. Mirabel	Jason Swinford	N/A	Attorney/Client	Bates Labeled SWINFORD FED PRIVILEGE – 000004
3.	10/29/15	Letter re: [REDACTED]	Eric P. Mirabel	Jason Swinford, Jerry Swinford	N/A	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000005- 11
4.	10/29/15	Email re: [REDACTED]	Jason Swinford	Eric P. Mirabel	Jerry Swinford	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000012- 13
5.	Undated	Attachment to Document 4, entitled [REDACTED]	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000014- 26
6.	Undated	Attachment to Document 4, entitled [REDACTED]	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000027- 32
7.	11/02/15	Email re: [REDACTED]	Eric P. Mirabel	Jason Swinford	N/A	Attorney/client	Bates Labeled SWINFORD FED PRIVILEGE – 000033
8.	11/02/15	Email re: [REDACTED]	Eric Mirabel	Jason Swinford; Jerry Swinford	N/A	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000034
9.	11/18/15	Email re: [REDACTED]	Eric Mirabel	Jason Swinford	N/A	Attorney/client Work Product	Bates Labeled SWINFORD FED PRIVILEGE –

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							000035
10.	Undated	Attachment to Document 8, entitled: “[REDACTED]”	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000036- 39
11.	Undated	Attachment to Document 8, entitled “[REDACTED]”	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000040- 45
12.	Undated	Attachment to Document 8, “[REDACTED],”	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000046- 47
13.	Undated	Attachment to Document 8, “[REDACTED]”	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000048- 60
14.	Undated	Attachment to Document 8, “[REDACTED]”	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000061- 73
15.	Undated	Attachment to Document 8, “[REDACTED]”	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000074- 75
16.	Undated	Attachment to Document 8, “[REDACTED]”	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000076- 79
17.	Undated	Attachment to Document 8, “[REDACTED],”	Eric Mirabel	Jason Swinford	Jerry Swinford	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000080- 89
18.	12/1/15	Email re: [REDACTED]	Eric Mirabel	Jason Swinford	N/A	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000090

	DATE	DOC TYPE/DESCRIPTION	AUTHOR	RECEIVER	SECONDARY RECEIVER	PRIVILEGE	DESCRIPTION
19.	11/30/15	Attachment to Document 18, [REDACTED]	Eric Mirabel	Jason Swinford	N/A	Attorney/Client Work Product	Bates Labeled SWINFORD FED PRIVILEGE – 000091- 92